

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRADLEY J. SCHAUFENBUEL; ROBERT N. SCHAUFENBUEL)
JOHN AND SARAH REED, IV; JOAN AND JAN REED, III;)
AMERICAN MASS MEDIA CORPORATION; ROBERTA K. CLARK;)
MARIA A VALENTIN; LIAM A. ANGELINI; KEITH A. AND)
BONNIE C. RAINES; RAVIKUMAR AND SUMATHI)
JAMMALAMADAKA; PAUL J. HERINK; G. MATTHEW)
KNOWLTON; WILHELM HALL; KATHLEEN F. MARKUS;)
JONATHAN PATTON; KATHLEEN TAJAK; RUTH HALVERSON,)
AS TRUSTEE OF THE HALVERSON FAMILY TRUST; DAVE)
HALE; JOSEPH CAVALUZZI; JOSEPH S. PEARSE; ANDREW)
KAUFMAN; FRANK M. CUPP; THOMAS AND MARY)
O'SULLIVAN-SNYDER; MARY O'SULLIVAN-SNYDER AS)
ADMINISTRATOR OF THE ESTATE OF SARAH PEARSE;)
PATRICK O'SULLIVAN; DANIEL SULLIVAN; KAILASH AND)
KANTA GUPTA; NISHANT GUPTA; NATASHA GUPTA;)
WILLIAM R. RICHOS; ON BEHALF OF THEMSELVES AND)
ALL OTHERS SIMILAR SITUATED,)

PLAINTIFFS,)

VS.)

INVESTFORCLOSURES FINANCIAL, LLC; ROI DEVELOPERS;)
INVESTFORCLOSURES; INVESTFORCLOSURES.COM, LLC;)
INVESTFORCLOSURES VENTURES, LLC; SANDS OF GOLD)
ESCROW; SANDS OF GOLD; ROI FINANCIAL; REALTY)
OPPORTUNITIES INTERNATIONAL S. DE R.L. DE C.V.;)
REALTY OPPORTUNITIES INTERNATIONAL; ROI MEXICO;)
SANDS OF GOLD ESTATES; FRANCIS X. SANCHEZ AKA)
FRANK SANCHEZ; JAMES D. BOURASSA AKA JIM)
BOURASSA; SCOTT D. WESSEL; DEANA M GUIDI; DANIEL)
E. FITZGERALD AKA DAN FITZGERALD; SCOTT SLAGLE;)
DARCEY L. MARTIN; TOM RODRIGUEZ; AMO REALTY)
INTERNATIONAL, LTD.; WAYNE M. O'DAY; RICHARD)
SANCHEZ; SALOMON SANCHEZ JR.; SANCHEZ & RIVERA)
EXCHANGE CORP; SANCHEZ & RIVERA GROUP, LLC;)
SANCHEZ & RIVERA TITLE CO.; SANCHEZ & RIVERA TITLE,)
LLC; MAURICIO SANCHEZ; INVESTFORCLOSURES)
NATIONAL, LLC; AND JOHN DOES 1 – 30,)

DEFENDANTS.)

No. 09-cv-01221

JUDGE LEINENWEBER

MAGISTRATE JUDGE NOLAN

JURY DEMAND

DEFENDANT FRANCIS SANCHEZ's MOTION TO EXTEND

NOW COMES the Defendant, **FRANCIS SANCHEZ**, by and through his attorneys, **SANCHEZ DANIELS & HOFFMAN, LLP**, and move this Court for an extension of time to

respond to certain outstanding discovery and for an extension of the hearing date on the Preliminary Injunction. In support therefore, Defendant states as follows:

1. On August 27, 2009, the firm of SANCHEZ DANIELS & HOFFMAN, LLP, was retained by Francis Sanchez for representation in the above captioned matter.

2. The firm is also in the process of confirming its representation of various other Defendants in this matter.

3. Immediately upon confirmation of said retention by Francis Sanchez, counsel for Defendant diligently conducted a preliminary search relating to the status of the pleadings and existence of file materials.

4. Counsel for Defendant is in the process of making expedited arrangements to obtain all file materials and information relating to this action and the Preliminary Injunction hearing. Despite such efforts, sufficient information and material cannot be obtained in a timely enough that would allow counsel to properly respond to either the August 28, 2009 deadline for production of affidavits / legal memorandum relating to the appropriateness of a Preliminary Injunction, or to the hearing set for September 2, 2009 at 9:30 a.m. *See August 14, 2009 Extension of TRO with Asset Freeze, entered by this Court.*

5. It is pivotal to the defense of this matter that counsel be afforded an opportunity to obtain the file material and make an assessment of said material prior to the hearing. This motion is in no way being brought forth to further delay the litigation in this matter, or to unduly prejudice or harass any of the parties.

6. In order to gather and assess all necessary material, Defendant's request an additional twenty one (21) days to respond to outstanding discovery; to continue the hearing on the Preliminary Injunction an additional twenty eight (28) days, and in the interim for all entered orders to remain in effect through this extension of time.

WHEREFORE, said Defendant prays for relief accordingly.

Respectfully submitted,

SANCHEZ DANIELS & HOFFMAN, LLP

By: s/Elaine C. Davenport

One of the Attorneys for Defendant

FRANCIS SANCHEZ

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